

LAW OFFICES OF
MICHAEL K. CHONG LLC

2 EXECUTIVE DRIVE, STE. 720
FORT LEE, NEW JERSEY 07024
(201) 708-6675 FAX (201) 708-6676

EMAIL: MKCHONG@MKCLAWGROUP.COM

MICHAEL K. CHONG ‡

‡ MEMBER, NJ BAR, U.S.D.C. NEW JERSEY
SDNY, NEW YORK
EDNY, NEW YORK

NEW YORK:

1250 BROADWAY 36TH FL. STE. 300
NEW YORK, NEW YORK 10001
(212) 726-1104 FAX (212) 726-3104

HOBOKEN:

300 HUDSON STREET STE. 10
HOBOKEN, NEW JERSEY 07030
(201) 203-7476 FAX (201) 708-6676

** Please Reply to: Fort Lee*

August 11, 2015

Via ECF

Hon. Steven I. Locke, U.S.M.J.
Courtroom 820
100 Federal Plaza
Central Islip, NY 11722
Englewood, NJ 07631

Re: Siancas et al. v. Exclusive Detailing Inc. et al.
Docket No.: 2:14-cv-6151

Dear Judge Locke:

This office represents defendant Exclusive Detailing Inc. ("EDI") in the above referenced matter. According to Your Honor's order dated July 23, 2015, and our follow up phone discussion concerning the scheduling of this deposition, the parties have until August 31, 2015 to complete this deposition. Plaintiff seeks to depose a person from EDI who prepared the employee list, which Plaintiff's counsel now questions.

Plaintiff's counsel Steven Moser, Esq. has noticed the deposition of Michael Agoila, the owner of EDI. Mr. Agoila has no knowledge as to how the employee list was prepared at all. I have advised Plaintiff's counsel of same, and specifically that Mr. Agoila did not prepare the employee list, and that Carl Del Almeida of EDI prepared the employee list, and as such Mr. Almeida is the relevant person that Plaintiff's counsel should depose.

I have conferred in good faith about the above twice with Plaintiff's counsel via phone to no avail. Plaintiff's counsel refuses to take the deposition of Carl Del Almeida, and insists that I should submit a written request to Your Honor, and that Your Honor issue an order as to same.

I apologize for burdening Your Honor with such a basic discovery issue, that counsel should be able to resolve without the need for court intervention.

Respectfully submitted,

Michael K. Chong

Michael K. Chong, Esq.

MKC/

cc: Steven Moser, Esq. (Plaintiff's counsel)
Melissa Stannard, Esq. (Co-Defendants' counsel)
James McGrath, Esq. (Co-Defendants' counsel)